

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KAREN FUNDERBURK, on behalf of herself))	
and all others similarly situated,))	
)	
Plaintiff,))	
)	No. 13-CV-04848
v.))	
)	
THE WIRBICKI LAW GROUP, LLC, and))	
BANK OF AMERICA, N.A., as successor))	Magistrate Judge Kim (consent filed)
by merger to BAC Home Loans Servicing, LP,))	
)	
Defendants.))	

PLAINTIFF’S MOTION FOR PRELIMINARY APPROVAL

Plaintiff Karen Funderburk, by and through her attorneys, hereby files this request for preliminary approval of the parties’ Class Action Settlement Agreement and states as follows:

1. All parties have now executed a Settlement Agreement, reached after multiple months of negotiations and substantial give-and-take.

2. The Settlement Agreement, and its respective exhibits, is attached as Exhibit 1 hereto.

3. In accordance with the terms of the Settlement Agreement, Plaintiff hereby requests that a Preliminary Approval Order be entered, the proposed Settlement Classes be certified for settlement purposes, and the Class Notice plan be approved for distribution.

4. A memorandum in support of this motion is being contemporaneously filed herewith.

WHEREFORE, Plaintiff respectfully requests that this Court preliminarily approve the parties’ Class Action Settlement Agreement (Exhibit C to Exhibit 1) and set a date for a Final Fairness Hearing ninety (90) days from entry of the Preliminary Approval Order.

Respectfully submitted,

By: /s/ Stacy M. Bardo
One of Plaintiff's Attorneys

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